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December 8, 2015

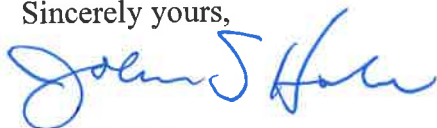
FOIA Officer
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105

Dear Sir or Madam:

This is a request for records pursuant to the Freedom of Information Act. Please provide a copy of all records EPA or its counsel have received pursuant to Information Requests dated October 19, 2015 and addressed to: (1) Art Moosmann, President of Fireman's Fund Insurance Company; and (2) Alex D. Moglia as Trustee of the Estate of D/C Distribution, LLC. A copy of each of those Information Requests is attached.

I agree to be responsible for the costs of copying the requested records.

Sincerely yours,



John S. Hahn

Enclosure

cc: Patti Hurst, U.S. DOJ
Larry Bradfish, U.S. EPA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

OCT 19 2015

Via Certified Mail

Art Moossmann, President
Fireman's Fund Insurance Company
777 San Marin Drive
Novato, CA 94998

Return Receipt # 7012 1640 0001 2190 5744

URGENT LEGAL MATTER

Re: Information Request Pursuant to 42 U.S.C. § 9404(e)
Regarding Certain Policies of Insurance Written by Fireman's Fund Insurance Company

Dear Mr. Moossmann:

The United States Environmental Protection Agency ("EPA") and the U.S. Navy are spending public funds to investigate and respond to actual or potential releases of hazardous substances, pollutants or contaminants at the Oahu Sugar Facility ("the Site"), located in the Pearl Harbor Naval Complex Superfund Site, Joint Base Pearl Harbor Hickam, Oahu, Hawaii. Several Fireman's Fund Insurance Policies were issued to American Factors ("AMFAC"), the parent company of Oahu Sugar Company, LLC. Oahu Sugar Company, LLC, is currently in bankruptcy proceedings in the United States Bankruptcy Court, Northern District of Illinois. EPA believes that you ("Respondent") may have information that will assist EPA in its investigation of the Site, and EPA seeks your answers to the questions contained in Enclosure B. Definitions and instructions on how to respond to the questions are provided in Enclosure A.

Under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. §9604(e), EPA has broad information-gathering authority which allows EPA to require persons to furnish information or documents relating to:

- (A) The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility.
- (B) The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility.
- (C) Information relating to the ability of a person to pay for or perform a cleanup.

Please note that compliance with this Information Request is mandatory. Failure to respond fully and truthfully may result in an enforcement action by EPA pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. §9604(e)(5). This statutory provision authorizes EPA to seek the imposition of penalties of up to **\$37,500 per day** of noncompliance. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. §1001. The information you provide may be used by EPA in administrative, civil, or criminal proceedings.

While you may assert a business confidentiality claim covering all or part of the information requested in this letter, as provided in 40 C.F.R. § 2.203(b), you may not withhold information upon that basis. Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. EPA will construe the failure to furnish a confidentiality claim as a waiver of any claim, and may make the information available to the public without further notice. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. §§ 3501, *et seq.*

Pursuant to 40 C.F.R. §2.310(h), Disclosure to Authorized Representatives, you are given notice of the contemplated disclosures by EPA of the information provided in response to this Information Request to authorized representatives of EPA. EPA's authorized representatives include GRB Environmental Services Inc., Toeroek Associates Inc., and Toeroek Herndon Joint Venture. Any subsequent additions or changes in EPA contractors who may have access to your responses will be published in the Federal Register. This information may be made available to these authorized representatives of EPA for any of the following reasons: to assist with document handling, analysis, inventory and indexing. Pursuant to 40 C.F.R. §2.310(h), you may submit comments regarding EPA's disclosure of any confidential information contained in your response to EPA's authorized representatives within thirty (30) calendar days of the date of this letter.

Because of the legal ramifications regarding this request, EPA strongly encourages you to give this matter your immediate attention. Responses to this Information Request must be made in writing, signed by a duly authorized representative, and submitted to EPA within thirty (30) calendar days of the date of this letter. Your responses and any technical questions should be directed to:

Carl Brickner
United States Environmental Protection Agency, Region 9
75 Hawthorne Street, SFD-7-5
10th Floor
San Francisco, CA 94105
Phone 415-972-3814
Email: Brickner.carl@epa.gov

If you have any legal questions regarding this letter, please contact Larry Bradfish, Office of Regional Counsel, EPA Region 9 at 415-972-3934 or bradfish.larry@epa.gov . Thank you for your attention and cooperation regarding this matter.

Sincerely,

A handwritten signature in black ink that reads "Kathi Moore". The signature is fluid and cursive, with the first name "Kathi" and last name "Moore" clearly distinguishable.

Kathi Moore, Manager
CERCLA Enforcement Section
Site Cleanup Branch
Superfund Division

cc: Larry Bradfish, Esq., ORC, EPA Region IX
Mark D. Plevin, Esq., Crowell & Moring, LLP
Patricia L. Hurst, Esq., U.S. Dept. of Justice

Enclosures: Enclosure A, Instructions and Definitions
Enclosure B, Information Request Questions
Enclosure C, Fireman's Fund Insurance Policies

ENCLOSURE A: INSTRUCTIONS AND DEFINITIONS

Instructions:

1. Answer Every Question Completely. A separate response must be made to each of the questions set forth in this information request. For each question contained in this letter, if information responsive to this information request is not in the Respondent's possession, custody, or control, please identify the person(s) from whom such information may be obtained.
2. Number Each Answer. When answering the questions in Enclosure B, please precede each answer with the corresponding number of the question and subpart to which it responds.
3. Number Each Document. For each document produced in response to this information request, indicate on the document, or in some other reasonable manner, the number of the question to which it corresponds.
4. Provide the Best Information Available. Provide responses to the best of the Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. The Respondent should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available will be considered non-compliance with this information request.
5. Identify Sources of Answer. For each question, identify all the persons and documents (see Definitions) that the Respondent relied on in producing its answer.
6. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this information request become known or available to the Respondent after it responds to this information request, EPA hereby requests pursuant to CERCLA Section 104(e) that the Respondent supplement its response to EPA.
7. Scope of Request. The scope of this request includes all information and documents independently developed or obtained by research on the part of the Respondent, its attorneys and consultants or any of their agents, consultants or employees.
8. Confidential Information. The information requested herein must be provided even though the Respondent may contend that it includes confidential information or trade secrets. The Respondent may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§9604(e)(7)(E) and (F), and Section 3007(b) of RCRA, 42 U.S.C. §6927(b), and 40 C.F.R. §2.203(b). If the Respondent makes a claim of confidentiality for any of the information it submits to EPA, it must prove that claim. For each document or response the Respondent claims as confidential, it must separately address the following points:
 - (a) Clearly identify the portions of the information alleged to be entitled to confidential treatment;

- (b) Identify the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);
- (c) Identify measures taken by the Respondent to guard against the undesired disclosure of the information to others;
- (d) Explain the extent to which the information has been disclosed to others, and the precautions taken in connection therewith;
- (e) Provide pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
- (f) State whether the Respondent asserts that disclosure of the information would likely result in substantial harmful effects to the Respondent's competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.
- (g) To make a confidentiality claim, please stamp, or type, "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise nonconfidential documents should be clearly identified. The Respondent should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit the Respondent's response so that all nonconfidential information, including any redacted versions of documents, are in one envelope and all materials for which the Respondent desires confidential treatment are in another envelope.
- (h) All confidentiality claims are subject to EPA verification. It is important that the Respondent satisfactorily show that it has taken reasonable measures to protect the confidentiality of the information and that it intends to continue to do so, and that the information is not and has not been obtainable by legitimate means without the Respondent's consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by CERCLA Section 104(e). If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to the Respondent.

9. Objections to Questions. If the Respondent has objections to some or all of the questions contained in the information request, it is still required to respond to each of the questions.

Definitions Applicable to Enclosure B, Information Request:

1. Any reference to Fireman's Fund Insurance Company should be interpreted to include, but not be limited to, all agents, trustees, predecessors, successors, subsidiaries, operating divisions, affiliates and branches.
2. The term "person" shall include any individual, firm, unincorporated association, partnership, corporation, trust, joint venture, or other entity.
3. The term "waste" or "wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid or sludge.
4. The term "hazardous waste" shall have the same definition as that contained in Section 1004(5) of RCRA.
5. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any - other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
6. The term "release" has the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, the abandonment or discharging of barrels, containers and other closed receptacles containing any hazardous substance or pollutant or contaminant.
7. The term "pollutant or contaminant" shall have the same definition as that contained in Section 101(33) of CERCLA and include any mixtures of such pollutants and contaminants with any other substance including petroleum products.
8. The term "materials" shall mean all substances that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Site including, but not limited to, all hazardous substances, pollutants or contaminants.
9. The term "documents" includes any written, recorded, computer generated, or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts, and all non-identical copies.
10. The term "AMFAC" shall mean (a) AMFAC, Inc., (b) subsidiaries of AMFAC, Inc., including but not limited to D/C Distribution, LLC, and Oahu Sugar Company, LLC, (c) any companies which are or were under the operating control of AMFAC, INC., or its subsidiaries, and (d) any partnership or joint venture which is or was under operating control of AMFAC, INC., or its subsidiaries and (e) any entity or person that would qualify as an insured on any policy listed on Enclosure C.

ENCLOSURE B: INFORMATION REQUEST

1. For each person answering these questions on behalf of Respondent, provide:
 - a. Full name
 - b. Title
 - c. Business address
 - d. Business telephone number, fax number, and email address
2. If Respondent wishes to designate an individual for all future correspondence concerning the Sites, including any legal notices, please so indicate here by providing that individual's name, address, telephone number, fax number, and email address.
3. For each policy of insurance identified in Enclosure C, provide the policy. If a policy is unavailable, provide a description of the type of coverage, if known, for each unavailable policy.
4. For each policy of insurance identified in Enclosure C, provide loss control files or other information showing any erosion of any policy limit.
5. Provide evidence of all claims made under any of the policies identified in Enclosure C, including but not limited to all claims made by D/C Distribution, LLC, or its counsel, or by Brayton & Purcell, LLP.
6. Identify all settlements by Respondent (or Respondent's predecessors), or by D/C Distribution, LLC, that refer to any one or more of the policies identified in Enclosure C, including:
 - a. The date of the settlement;
 - b. The scope of release provided under such settlement; and
 - c. The amount of money paid by Respondent pursuant to such settlement.

ENCLOSURE C: POLICIES OF INSURANCE WRITTEN BY FIREMAN'S FUND

Fireman's Fund PC1285254
Fireman's Fund PC1324500
Fireman's Fund LC13299023
Fireman's Fund LC1329023
Fireman's Fund LC1655700
Fireman's Fund XL34764
Fireman's Fund XL38650
Fireman's Fund XL8105995
Fireman's Fund CGL0001254
Fireman's Fund AS1666062
Fireman's Fund LA0652578
Fireman's Fund L1328895
Fireman's Fund PC1324517
Fireman's Fund PC10324318
Fireman's Fund LA0652584
Fireman's Fund LA06553504
Fireman's Fund L1328865
Fireman's Fund LG6466
Fireman's Fund PC 10324318
Fireman's Fund LS1177730
Fireman's Fund L1355135
Fireman's Fund LS1177729
Fireman's Fund L1355171
Fireman's Fund LA0652581
Fireman's Fund LA0652587
Fireman's Fund L1328936
Fireman's Fund PC1324500



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

OCT 19 2015

Via Certified Mail

Return Receipt #70121640000121905812

Alex D. Moglia, Esq.
Trustee, Estate of D/C Distribution, LLC
Moglia Advisors
1325 Remington Road, Suite H
Schaumburg, IL 60173

URGENT LEGAL MATTER

Re: Information Request Pursuant to 42 U.S.C. § 9404(e)
Regarding Claims of Coverage Under Certain Policies of Insurance

Dear Mr. Moglia:

The United States Environmental Protection Agency ("EPA") and the U.S. Navy are spending public funds to investigate and respond to actual or potential releases of hazardous substances, pollutants or contaminants at the Oahu Sugar Facility ("the Site"), located in the Pearl Harbor Naval Complex Superfund Site, Joint Base Pearl Harbor Hickam, Oahu, Hawaii. Insurance policies were issued to American Factors, the parent company of Oahu Sugar Company, LLC. Oahu Sugar Company, LLC, is currently in bankruptcy proceedings in the United States Bankruptcy Court, Northern District of Illinois. EPA believes that you ("Respondent") may have information that will assist EPA in its investigation of the Site, and EPA seeks your answers to the questions contained in Enclosure B. Definitions and instructions on how to respond to the questions are provided in Enclosure A.

Under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. §9604(e), EPA has broad information-gathering authority which allows EPA to require persons to furnish information or documents relating to:

- (A) The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility.
- (B) The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility.
- (C) Information relating to the ability of a person to pay for or perform a cleanup.

Please note that compliance with this Information Request is mandatory. Failure to respond fully and truthfully may result in an enforcement action by EPA pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. §9604(e)(5). This statutory provision authorizes EPA to seek the imposition of penalties of up to **\$37,500 per day** of noncompliance. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. §1001. The information you provide may be used by EPA in administrative, civil, or criminal proceedings.

While you may assert a business confidentiality claim covering all or part of the information requested in this letter, as provided in 40 C.F.R. § 2.203(b), you may not withhold information upon that basis. Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. EPA will construe the failure to furnish a confidentiality claim as a waiver of any claim, and may make the information available to the public without further notice. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. §§ 3501, *et seq.*

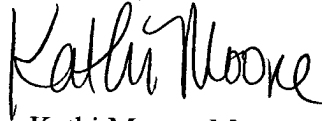
Pursuant to 40 C.F.R. §2.310(h), Disclosure to Authorized Representatives, you are given notice of the contemplated disclosures by EPA of the information provided in response to this Information Request to authorized representatives of EPA. EPA's authorized representatives include GRB Environmental Services Inc., Toeroek Associates Inc., and Toeroek Herndon Joint Venture. Any subsequent additions or changes in EPA contractors who may have access to your responses will be published in the Federal Register. This information may be made available to these authorized representatives of EPA for any of the following reasons: to assist with document handling, analysis, inventory and indexing. Pursuant to 40 C.F.R. §2.310(h), you may submit comments regarding EPA's disclosure of any confidential information contained in your response to EPA's authorized representatives within thirty (30) calendar days of the date of this letter.

Because of the legal ramifications regarding this request, EPA strongly encourages you to give this matter your immediate attention. Responses to this Information Request must be made in writing, signed by a duly authorized representative, and submitted to EPA within thirty (30) calendar days of the date of this letter. Your responses and any technical questions should be directed to:

Carl Brickner
United States Environmental Protection Agency, Region 9
75 Hawthorne Street, SFD-7-5
10th Floor
San Francisco, CA 94105
Phone 415-972-3814
Email: Brickner.carl@epa.gov

If you have any legal questions regarding this letter, please contact Larry Bradfish, Office of Regional Counsel, EPA Region 9 at 415-972-3934 or bradfish.larry@epa.gov . Thank you for your attention and cooperation regarding this matter.

Sincerely,

A handwritten signature in black ink that reads "Kathi Moore". The signature is written in a cursive, flowing style.

Kathi Moore, Manager
CERCLA Enforcement Section
Site Cleanup Branch
Superfund Division

cc: Larry Bradfish, Esq., ORC, EPA Region IX
Joseph Frank, FrankGecker LLP, Counsel to the Trustee
Patricia L. Hurst, Esq., U.S. Dept. of Justice

Enclosures: Enclosure A, Instructions and Definitions
Enclosure B, Information Request Questions

ENCLOSURE A: INSTRUCTIONS AND DEFINITIONS

Instructions:

1. Answer Every Question Completely. A separate response must be made to each of the questions set forth in this information request. For each question contained in this letter, if information responsive to this information request is not in the Respondent's possession, custody, or control, please identify the person(s) from whom such information may be obtained.
2. Number Each Answer. When answering the questions in Enclosure B, please precede each answer with the corresponding number of the question and subpart to which it responds.
3. Number Each Document. For each document produced in response to this information request, indicate on the document, or in some other reasonable manner, the number of the question to which it corresponds.
4. Provide the Best Information Available. Provide responses to the best of the Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. The Respondent should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available will be considered non-compliance with this information request.
5. Identify Sources of Answer. For each question, identify all the persons and documents (see Definitions) that the Respondent relied on in producing its answer.
6. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this information request become known or available to the Respondent after it responds to this information request, EPA hereby requests pursuant to CERCLA Section 104(e) that the Respondent supplement its response to EPA.
7. Scope of Request. The scope of this request includes all information and documents independently developed or obtained by research on the part of the Respondent, its attorneys and consultants or any of their agents, consultants or employees.
8. Confidential Information. The information requested herein must be provided even though the Respondent may contend that it includes confidential information or trade secrets. The Respondent may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§9604(e)(7)(E) and (F), and Section 3007(b) of RCRA, 42 U.S.C. §6927(b), and 40 C.F.R. §2.203(b). If the Respondent makes a claim of confidentiality for any of the information it submits to EPA, it must prove that claim. For each document or response the Respondent claims as confidential, it must separately address the following points:
 - (a) Clearly identify the portions of the information alleged to be entitled to confidential treatment;

- (b) Identify the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);
- (c) Identify measures taken by the Respondent to guard against the undesired disclosure of the information to others;
- (d) Explain the extent to which the information has been disclosed to others, and the precautions taken in connection therewith;
- (e) Provide pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
- (f) State whether the Respondent asserts that disclosure of the information would likely result in substantial harmful effects to the Respondent's competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.
- (g) To make a confidentiality claim, please stamp, or type, "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise nonconfidential documents should be clearly identified. The Respondent should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit the Respondent's response so that all nonconfidential information, including any redacted versions of documents, are in one envelope and all materials for which the Respondent desires confidential treatment are in another envelope.
- (h) All confidentiality claims are subject to EPA verification. It is important that the Respondent satisfactorily show that it has taken reasonable measures to protect the confidentiality of the information and that it intends to continue to do so, and that the information is not and has not been obtainable by legitimate means without the Respondent's consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by CERCLA Section 104(e). If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to the Respondent.

9. Objections to Questions. If the Respondent has objections to some or all of the questions contained in the information request, it is still required to respond to each of the questions.

Definitions Applicable to Enclosure B, Information Request:

1. Any reference to D/C Distribution, LLC, should be interpreted to include, but not be limited to, all agents, trustees, predecessors, successors, subsidiaries, operating divisions, affiliates and branches, as well as the bankruptcy estate of D/C Distribution, LLC, and its agents, trustees, predecessors, successors, subsidiaries, operating divisions, affiliates and branches.
2. The term "person" shall include any individual, firm, unincorporated association, partnership, corporation, trust, joint venture, or other entity.
3. The term "waste" or "wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid or sludge.
4. The term "hazardous waste" shall have the same definition as that contained in Section 1004(5) of RCRA.
5. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any - other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
6. The term "release" has the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, the abandonment or discharging of barrels, containers and other closed receptacles containing any hazardous substance or pollutant or contaminant.
7. The term "pollutant or contaminant" shall have the same definition as that contained in Section 101(33) of CERCLA and include any mixtures of such pollutants and contaminants with any other substance including petroleum products.
8. The term "materials" shall mean all substances that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Site including, but not limited to, all hazardous substances, pollutants or contaminants.
9. The term "documents" includes any written, recorded, computer generated, or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts, and all non-identical copies.
10. The term "AMFAC" shall mean (a) AMFAC, Inc., (b) subsidiaries of AMFAC, Inc., including but not limited to D/C Distribution, LLC, and Oahu Sugar Company, LLC, (c) any companies which are or were under the operating control of AMFAC, INC., or its subsidiaries, and (d) any partnership or joint venture which is or was under operating control of AMFAC, INC., or its subsidiaries and (e) any entity or person that would qualify as an insured on any policy listed on Enclosure C.

11. The term “FFIC” shall mean Fireman’s Fund Insurance Company and its agents, trustees, predecessors, successors, subsidiaries, operating divisions, affiliates and branches.

ENCLOSURE B: INFORMATION REQUEST

1. For each person answering these questions on behalf of Respondent, provide:
 - a. Full name
 - b. Title
 - c. Business address
 - d. Business telephone number, fax number, and email address
2. If Respondent wishes to designate an individual for all future correspondence concerning the Sites, including any legal notices, please so indicate here by providing that individual's name, address, telephone number, fax number, and email address.
3. Provide all policies of insurance issued to AMFAC under which Respondent or D/C Distribution, LLC, has made a claim of coverage. If a policy is unavailable, provide all information in your possession about the unavailable policy, including a description of the type of coverage, if known.
4. Provide evidence of all claims made (including all alleged losses) under any of the policies identified in response to (3) above.
5. Provide the correspondence dated on or about October 25, 2012, from Dwight B. Palmer, Jr., FrankGecker LLP, to Mark D. Plevin, Crowell & Moring LLP, regarding certain FFIC policies, including all attachments and enclosures.
6. Provide the correspondence dated on or about January 22, 2015, from Dwight B. Palmer, Jr., FrankGecker LLP, to Mark D. Plevin, Crowell & Moring LLP, regarding certain FFIC policies, including all attachments and enclosures.
7. Identify all settlements by Respondent or D/C Distribution, LLC, that refer to any one or more of the policies identified in response to (3) above, or to the alleged losses identified in response to (4) above, including:
 - a. The date of the settlement;
 - b. The scope of release provided under such settlement; and
 - c. The amount of money paid by Respondent pursuant to such settlement.

Provide a signature copy of each identified settlement.